

du Treil, Lundin & Rackley, Inc.

A Subsidiary of A. D. Ring, P.C.

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TECHNICAL EXHIBIT
SUPPORTING COMMENTS IN
MM DOCKET NO. 95-88
PREPARED FOR
W & B MEDIA, INC.
STATION WSFL-FM
NEW BERN, NORTH CAROLINA

Comparison of Aural Broadcast Services
Available to Rose Hill and Trenton, NC

	<u>Rose Hill</u>	<u>Trenton</u>
1990 Population	1,287	248
County	Duplin	Jones
County Population (1990)	39,995	9,414
Local Aural Service ¹	WEGG(AM) WBSY(FM)	NONE
Predicted 60 dBu Coverage ² :		
Population (1990)	41,307	344,038
Area (sq. km)	2,510	8,555

¹See Figure 4 for station facilities.

²WBSY assumed to employ maximum Class A facilities at Rose Hill and maximum Class C2 facilities at Trenton.

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	<u>Rose Hill</u>	<u>Trenton</u>
Number of Stations Having Transmitter Sites Within Proposed 60 dBu Contour:		
FM	1 ³	14 ⁴
AM	3 ³	11 ⁴
Number of Other Principal Community Signal Available ⁵ :		
FM	2 ⁶	7
AM	3 ⁶	0
Coverage of Urbanized Areas:	None	Jacksonville, NC ⁷

³2 Daytime, one fulltime

⁴1 Daytime, 10 fulltime

⁵70 dBu for FM, 5 mV/m for AM

⁶All daytime

⁷See Figure 2

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STATION WSFL-FM
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**Tabulation of Stations Providing Service to
Rose Hill and Trenton, North Carolina**

A. Local Rose Hill Stations:

WEGG	Rose Hill, NC,	710 kHz, 0.25 kW-D
WBSY	Rose Hill, NC	CH 284A, 2.8 kW, 78 m ¹

B. Stations Located Within Rose Hill 60 dBu Countour:

WZKB	Wallace, NC	CH232A, 3.3 kW, 90 m
WEGG	Rose Hill, NC	710 kHz, 0.25 kW-D
WLSE	Wallace, NC	1400 kHz, 1 kW-U
WTRQ	Warsaw, NC	1560 kHz, 10 kW-D

C. Stations Located Within Trenton 60 dBu Contour:

WSFL-FM	New Bern, NC	CH293C1, 100 kW, 279m
WRNS-FM	Kinston, NC	CH236C, 100 kW 477m
WTND	Grifton, NC	CH258C2, 16.5 kW 257m
WIKS	New Bern, NC	CH270C1, 100 kW, 299m
WZBR	Kinston, NC	CH249A, 3 kW, 76m
WXQR-FM	Jacksonville, NC	CH288A, 3 kW, 91m
WDLX	Washington, NC	CH227C, 100 kW, 543m

¹For study purposes, facilities are assumed to be maximum for a Class A station.

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WNCT-FM	Greenville, NC	CH300C,	100 kW,	518m
WQSL	Jacksonville, NC	CH222C2,	35 kW,	72m
WELS-FM	Kinston, NC	CH275A,	3 kW,	90m
WMSQ	Havelock, NC	CH285A,	3 kW,	50m
WKZF	Bayboro, NC	CH250A,	2.75 kW,	104m
WKQT	Newport, NC	CH277C1,	100 kW,	299m
WNBR	Oriental, NC	CH231C3,	11 kW,	148m
WNOS	New Bern, NC	1450 kHz,	1 kW-U	
WLOJ	New Bern, NC	1490 kHz,	1 kW-U	
WLNR	Kinston, NC	1230 kHz,	1 kW-U	
WLAS	Jacksonville, NC	910 kHz,	1/5 kW-LS, DA-N	
WJCV	Jacksonville, NC	1290 kHz,	1 kW-D	
WCOO	New Bern, NC	1380 kHz,	5 kW-D	
WRNS	Kingston, NC	960 kHz,	1/5 kW-LS, DA-N	
WJNC	Jacksonville, NC	1240 kHz,	1 kW-U	
WELS	Kinston, NC	1010 kHz,	1 kW-D	
WVOF	Camp Lejeune, NC	1580 kHz,	10 kW-D	
WCPQ	Havelock, NC	1330 kHz,	1 kW-D	

D. FM Stations Providing 70 dBu Signal to Rose Hill:

WZKB	Wallace, NC	CH232A,	3.3 kW,	90m
WKXB	Burgaw, NC	CH260C1,	100 kW,	158m

E. AM Stations Providing 5 mV/m Signal to Rose Hill:

WEGG	Rose Hill, NC	710 kHz,	0.25 kW-D
WLSE	Wallace, NC	1400 kHz,	1 kW-D
WTRQ	Warsaw, NC	1560 kHz,	10 kW-D

F. FM Stations Providing 70 dBu Signal to Trenton:

WSFL-FM	New Bern, NC	CH293C1,	100 kW,	279m
WRNS-FM	Kinston, NC	CH236C,	100 kW,	457m
WTND	Grifton, NC	CH258C2,	16.5 kW,	257m
WIKS	New Bern, NC	CH270C1,	100 kW,	299m

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**Figure 4
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WDLX	Washington, NC	CH227C,	100 kW,	543m
WNCT-FM	Greenville, NC	CH300C,	100 kW,	518m
WKQT	Newport, NC	CH277C1,	100 kW,	299m

G. AM Stations Providing 5 mV/m Signal to Trenton:**NONE**

Exhibit 2

DECLARATION

I, Bruce T. Simel, do hereby declare, certify and state as follows:

1. I am General Manager of Radio Station WSFL-FM, New Bern, North Carolina, which is licensed to W & B Media, Inc. I have been General Manager of the station since February 1994. I am also a resident of New Bern, North Carolina, and have lived in that community since February 1994, and I have been involved in a business serving the area since 1987. Based on the foregoing, I am quite familiar with the New Bern-Jacksonville-Kinston-Havelock, North Carolina metropolitan area.

2. Over the past several days, I have conducted extensive research into the population and demographics of Trenton, North Carolina, a community with which I am familiar, since it is located less than 20 miles from New Bern, North Carolina. In conducting this research I have consulted with the City Clerk of Trenton, North Carolina, and with various residents and leaders of that community. Based on that research and those discussions, I have ascertained the following facts:

a. Trenton has a population of only 289 persons. Of those persons, approximately 25 percent of the adult population is retired. Of the 75 percent of the

Trenton adult population that is in the workforce, 50 percent of that remaining population commutes from Trenton to one or more of the communities of Jacksonville, New Bern, Kinston and/or other communities other than Trenton.

b. Trenton does not have its own daily newspaper; however, the community is served by the Jones County Post, which is a weekly newspaper serving the entirety of Jones County, North Carolina (which includes Trenton). Other than the Jones County Post, which may or may not cover news specifically relating to Trenton, Trenton has no newspaper or other media located within Trenton that cover Trenton's local needs and interests. Rather, Trenton's local news and interests are, to the extent necessary, covered by media outside of Trenton, and in neighboring communities, such as Jacksonville, New Bern, Kinston and Havelock.

c. Community leaders and residents of Trenton perceive Trenton as being an integral part of the larger Jacksonville-New Bern-Kinston-Havelock metropolitan area.

d. Trenton has no government or elected officials except for an elected Mayor, an elected Town Board and an appointed Town Clerk.

e. Trenton, North Carolina, does not have its own telephone directory provided by the local telephone company; rather, Trenton telephone listings are incorporated into the local telephone directory for New Bern, North Carolina. Trenton does have a zip code; however, that zip code serves not only mail for Trenton but also mail for other portions of Jones County, North Carolina.

f. Trenton has some limited number of commercial establishments (e.g., one branch of a large bank, a restaurant, an automobile dealer, a convenience store, a game room, a drug store, a hardware store and a tire and feed store, as well as a handful of attorneys and/or accountants, and a hair stylist). However, this represents the extent of commercial establishments within Trenton. Trenton does not have its own health facilities, but, rather, relies on the health facilities provided through the auspices of Jones County, North Carolina. Trenton does not have its own transportation systems; rather, it must rely on

transportation systems serving other nearby communities.

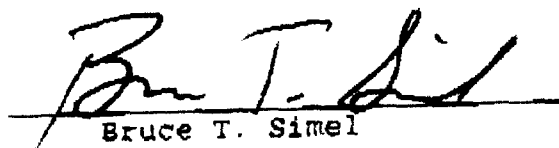
g. Trenton and the communities of Jacksonville, North Carolina; New Bern, North Carolina; Kinston, North Carolina; and Havelock, North Carolina, are part of the same advertising market. In this regard, to the extent that the limited number of commercial establishments in Trenton wish to advertise, they typically utilize advertisements in newspapers published in Jacksonville, New Bern or Kinston, North Carolina, or in the Jones County Post.

h. Trenton, North Carolina, does not have its own municipal police department, fire department, public utilities, or public libraries. Rather, Trenton utilizes the services of the Jones County Sheriff's Department for protection and utilizes a volunteer fire department. All of the public schools in Trenton are under the auspices of Jones County, North Carolina, as is the public library in Trenton.

3. Based on all of the foregoing, it is clear that Trenton, North Carolina is not an independent community, but, rather, is interdependent with the communities of Jacksonville, New Bern,

Kinston and Havelock, North Carolina, and with other communities
in and around Jones County, North Carolina.

I hereby declare, certify and state, under penalty of
perjury, that the foregoing is true and correct to the best of my
knowledge, information and belief.


Bruce T. Simel

Executed on: 8-8-95, 1995.


CERTIFICATE OF SERVICE

I, Mary Odder, a secretary with the law firm of Kaye, Scholer, Fierman, Hays & Handler, do hereby certify on this 10th day of August, 1995, caused copies of the foregoing Comments of W & B Media, Inc. to be mailed, via first-class U.S. mail, postage prepaid, to the following:

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